

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

KEVIN RELEFORD,)	
1011 Forest St., Apt 3)	
Kansas City, Kansas 66103)	
)	
Petitioner,)	
)	
v.)	
)	
FOUR B CORP. d/b/a PRICE CHOPPER)	
(Please serve registered agent:)	
Registered Agent Services, Inc.)	
4520 Main, Suite 1100)	
Kansas City, MO 64111))	
)	
Defendant.)	

PETITION FOR DAMAGES
(TF)

COMES NOW Plaintiff and or his cause of action herein states as follows:

1. Plaintiff is a resident of Kansas City, Wyandotte County, Kansas.
2. Defendant, Four B Corp. (hereinafter referred to as Price Chopper), is a corporation organized and existing according to law operating a grocery store at 95th and Bannister Road in Kansas City, Jackson County, Missouri under the name of Price Chopper.
3. That at all times mentioned herein Price Chopper owned, maintained and controlled the premises of its grocery store at 95th and Bannister Road.
4. Defendant employed agents, servants, and employees to operate and maintain its premises and that said agents, servants, and employees hereinafter referred to were at all times acting for and on behalf of the Defendant Price Chopper and on a mission for them.
5. Plaintiff further states that on or about August 25, 2015, Price Chopper was

Exhibit A

opened for business to the general public and Plaintiff was a business invitee of the Defendant on said premises on said date.

6. Plaintiff further states that on the aforementioned property on August 25, 2015 while near a register for checkout on said premises, Plaintiff slipped and fell on a wet substance on the floor injuring him as hereinafter set out.

7. Plaintiff further states that the substance on the floor constituted a hazard to invitees such as Plaintiff and that the Defendant through its agents, servants, and employees knew or by the use of ordinary care could have known of this condition and Defendant by its agents, servants, and employees failed to use ordinary care to properly warn of, barricade, remove the dangerous condition.

8. That as a direct and proximate result of the negligence of the Defendant the Plaintiff sustained an injury to his right shoulder resulting in a rotator cuff injury necessitating surgery.

9. That Plaintiff has been forced to expend money for hospitals, physicians, and medicines and in the future will be forced to expend other large sums of money to retain his health.

10. That at the time of said injuries Plaintiff was healthy, able and well bodied individual but as a result of the injuries as aforementioned had to sustain from his usual work and occupation resulting in wage loss.

11. That Plaintiff has suffered permanent injury and in the future will continue to suffer great pain and anguish to both the body and mind all to his damage.

WHEREFORE, Plaintiff prays for judgment against the Defendant for such damages as are fair and reasonable to compensate him for his loss, together with his costs incurred and expended and for such other relief as the Court deems just and proper.

Respectfully Submitted,

RUBINS, KASE, HAGER,
CAMBIANO & BRYANT

/s/ Joseph A. Cambiano
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ATTORNEY FOR PLAINTIFF

RULE 25.1 CERTIFICATE

I hereby certify that I have this 25th day of February 2020, mailed to Kevin Releford, a copy of the Notice of Dispute Resolution Services, Jackson County FORM CIRCT 2030, postage prepaid.

/s/ Joseph A. Cambiano
Joseph A. Cambiano